

# **EXHIBIT C**

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SURGICAL INSTRUMENT SERVICE  
COMPANY, INC.,

*Plaintiff,*

v.

INTUITIVE SURGICAL, INC.,  
*Defendant.*

Case No. 3:21-cv-03496-AMO

**STIPULATIONS REGARDING  
INTUITIVE'S UNCLEAN HANDS  
DEFENSE**

The Honorable Araceli Martínez-Olguín

1 Plaintiff Surgical Instrument Service Company, Inc. (“SIS”), and Defendant Intuitive  
2 Surgical, Inc. (collectively, the “Parties”) hereby stipulate as follows:

3 1. The Parties jointly stipulate and agree that Intuitive shall not present an unclean hands  
4 defense to the jury at trial, and will not seek to offer any argument, testimony, or other evidence in  
5 support of that defense at trial.

6 2. Nothing in this Stipulation in any way limits, precludes, or prevents Intuitive from  
7 offering any argument, testimony, or other evidence that Intuitive may present with respect to its  
8 Counterclaims, even if that evidence also may have been relevant to an unclean hands defense.  
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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: November 11, 2024

By: DRAFT  
Kenneth A. Gallo

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**E-Filing Attestation**

I, Kenneth A. Gallo, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above have concurred in this filing.

**DRAFT**